

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG VIRGINIA

IN RE: **GEORGE ROOSEVELT SEWARD, SR**
KAREN DENISE SEWARD

CHAPTER 13
CASE NO. **11-60543**

**NOTICE AND OPPORTUNITY FOR HEARING
REGARDING DEBTORS' PROPOSED ADEQUATE PROTECTION PAYMENTS
PURSUANT TO WESTERN DISTRICT BANKRUPTCY STANDING ORDER #9**

The Debtors by counsel state as follows:

1. On 2/28/2011, the Debtors filed in this court a Petition under Chapter 13 of the United States Bankruptcy Code.
2. The Debtors proposed Chapter 13 Plan dated 4/25/2011 proposes that the Chapter 13 Trustee make monthly adequate protection payments in the following amounts beginning in the first month of the proposed plan.

| Creditor | Monthly Payment Amount |
|----------------------------|------------------------|
| C & F Finance | \$226.05 |
| Regional Acceptance | \$169.54 |

3. The proposed adequate protection payments are less than the regular contractual payments due to the secured creditors noted above.
4. Pursuant to STANDING ORDER #9 entered 12/15/2006 by Chief Judge of the Bankruptcy Court for the Western District of Virginia, the secured creditors named above have 15 days from the date of the service of this notice with the United States Bankruptcy Court, 1101 Court Street, Lynchburg, Virginia 24505 and serve a copy of the same upon the counsel for the Debtors at the address given below.

The Debt Law Group, PLLC
Richard Oulton, Esq
207 A South Main Street
Blackstone, VA 23824
434-292-6529
434-292-7529 Fax

WHEREFORE, your Debtors notice the creditor that unless the creditor objects, and sets that objection for a hearing, to the Proposed Adequate Protection Payment within 15 days of date of service of this Notice, the creditor is deemed pursuant to Local Standing Order No. 9 to have stipulated its agreement to the payments provided in this notice and the trustee is authorized to begin disbursements once a claim has been filed.

Respectfully Submitted

By:/s/ Richard J Oulton
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby, certify that I have this date mailed a true copy of the foregoing pleading to all affected creditors in compliance with Bankruptcy Rule 7004(b), (c), or (h), as applicable, including:

C & F Finance
4660 S Laburnum Ave
Richmond, VA 23231

Regional Acceptance Corp
4701 Cox Road Ste 301
Glen Allen, VA 23060

Date: May 5, 2011

/s/ Richard J Oulton
Counsel for Debtors

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